

IN THE UNITED STATES DISTRICT  
COURT  
FOR THE  
WESTERN DISTRICT OF  
WASHINGTON

Raghavendran Shankar  
Plaintiff

v.

2:24-cv-00308-JCC

Microsoft Corporation  
Defendant

Motion for Sanctions

ORAL ARGUMENT REQUEST

Plaintiff has reached out to the Defendant's Counsel asking them to refrain from asking for relief targeting/attacking the habits/character/reputation of the Plaintiff. Defendant's Motion to Dismiss requests of relief of opposing the essential function of working at Microsoft and engaging in dual employment while also alleging Moonlighting is not allowed as per the contract which is not true. Plaintiff has attempted to request the Defendant to meet and confer but they have avoided doing so and attempted to ask for relief without providing evidence of how the Plaintiff is engaging in the activity of dual employment. Plaintiff further told his manager Satish Rangavajulla that he was engaging in moonlighting with Clear Street and the Manager did not have issues with it. The Plaintiff was attempting to

understand allowable shifts for the Plaintiff and leave options while going through a manic episode during which he got terminated.

The factual contentions of Plaintiff engaging in the activity of dual employment do not have evidentiary support especially if the Plaintiff was granted an accommodation for time away/FMLA leave. The Plaintiff does not concede to opposing the essential function of working at Microsoft. The Plaintiff's manager Satish Rangavajulla knew of the Moonlighting and supported such activity. No software was built for Rocket Lawyer on Microsoft's devices. All statements made wrt moonlighting were made in reference to the plaintiff's protected classes of disability and religion.

Finally, the allegations of dual employment were made under the context Plaintiff does not belong to the protected class of disability and the Defendant failed to listen to details about other protected classes (religion) that were relevant because of disability.